

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:)	
)	
GREGORY B. MYERS,)	Case No. 15-26033-MCR
)	
Debtor,)	
_____)	
)	
BRIAN KING, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	Adversary Case No. 24-00007-MCR
v.)	
)	
ROGER SCHLOSSBERG, in His)	
Official Capacity as Chapter 7 Trustee)	
of the Bankruptcy Estate of Gregory B.)	
Myers,)	
)	
Defendant.)	
_____)	
)	

STIPULATION AND MOTION TO EXTEND TIME

Come now Brian King (“Mr. King”), Cristina King (“Mrs. King”), and Brian King in his capacity as trustee of the Cristina and Brian King Children’s Trust (the “Trustee of the Children’s Trust,” with the trust itself being known as the “Children’s Trust”)) (Mr. King, Mrs. King, and the Trustee of the Children’s Trust being collectively known as the “Plaintiffs” and each sometimes being known as a “Plaintiff”), and Roger Schlossberg, in his official capacity as Chapter 7 trustee of the bankruptcy estate of Gregory B. Myers (the “Trustee”), by and through respective undersigned counsel, pursuant to Federal Rule of Bankruptcy Procedure 9006 and Local Rule 7012-2, and stipulate as follows:

1. This adversary proceeding has a relatively *sui generis* origin, relating to a state court proceeding initiated in 2017 and being brought in a bankruptcy case that dates back to 2015.

The Trustee and the Plaintiffs, while directly adversarial at this juncture, have worked cooperatively to assess the various issues herein and remain engaged in good faith settlement discussions.

2. Pursuant to Federal Rule of Civil Procedure 4(m), made applicable by Federal Rule of Bankruptcy Procedure 7004(a)(1), the deadline for the Trustee to be served herein is April 9, 2024.

3. Although the summons originally issued in this case has expired, the parties have stipulated and agreed that the Trustee will waive formal service of the summons and complaint as well as any objection as to sufficiency of process in exchange for Plaintiffs' agreement to extend the Trustee's deadline to respond to the complaint through and including April 15, 2024. Insofar as the proposed deadline for the Trustee to respond is more than 30 days past the response date indicated in the summons, the parties believe such an extension must be accomplished through motions practice and cannot be achieved pursuant to Local Rule 7012-2.

4. The extension of time sought herein is designed to (i) facilitate ongoing settlement discussions; (ii) spare the estate the expense of responding to the complaint while such settlement discussions are earnestly ongoing; (iii) preserve judicial resources; and (iv) hopefully foment an ultimate resolution of this case. While the parties very much appreciate the import of moving expediently-but-judiciously, they also note that, in the context of this unique case, the modest extension requested herein will not prejudice any parties in interest.

5. The parties also ask this Honorable Court to continue the initial pre-trial conference, currently set for March 13, 2024, to a date of the court's election after April 15, 2024. Transparently, the parties are hopeful that a motion pursuant to Federal Rule of Bankruptcy Procedure 9019 may be brought before such a pre-trial conference is ultimately conducted, though

the parties' settlement negotiations are far from complete and a compromise of this matter is assuredly not a *fait accompli*.

Respectfully Submitted,

/s/ Maurice B. VerStandig
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of March 2024, a copy of the foregoing was served electronically upon filing via the ECF system on all counsel who have entered an appearance herein, which is currently solely comprised of the undersigned.

/s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.